

Exhibit G

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF DANIEL KRUESI

I, Daniel Kruesi, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.
2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.
3. On September 11, 2001, I was present at the second tower when the terrorist attacks of the World Trade Center Towers occurred.
4. On September 11, 2001 I was employed and working as an accountant at Fiduciary Trust, Inc. within the World Trade Center.
5. I was in New York at Ground Zero on the 90th floor of the second World Trade Center when both the first and second planes hit the towers and I received physical injuries in the escape and collapse. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a

war zone. When we were brutally attacked by terrorists my life was altered forever. I had never seen nor could I have imagined anything like it.

6. As a result of these terrorist attacks, my back and heart both suffered injuries on September 11, 2001. My heart suffered trauma from the stress of the event itself and possibly from the fall down the stairs. My back was injured in my attempt to escape the tower when I was thrown down the stairs. I have lived with significant back pain since that day and am unable to do many of the physical activities, including boxing, that I once enjoyed.
7. The various sights, sounds, and traumas I witnessed on 9/11 led to emotional anguish, the effects of which have been long-lasting. I was working on the 90th floor that day at my job as a tax accountant. I came in early because estimated tax payments were due on the 15th. The office was very quiet when I got there, and it seemed like no one was in yet. I remember looking at the clock at around 8:40am and thinking it was odd that there still were not many people around the office. Suddenly, from my vantage point on the 90th floor, I saw a huge explosion coming straight towards me. I dove onto the floor to take cover. I knew right away that it was a terrorist attack, since it had happened before and I was afraid it would happen again. I got together with some of my coworkers and I knew we had to get out of the building. Human Resources told us to take the elevator from the 90th floor to the 78th floor so I did. But, once we got to the 78th floor, I did not want to take the express elevator to the ground level because I had just been stuck in it the day before and I did not trust it, so I took the stairs. I was on the 45th floor when the second plane hit. I felt the whole building shake as I was thrown down the stairs. This is when I injured my back. I was afraid the whole building was going to topple over. It was rocking back and forth, and I was sure it was going to come down. When I finally got to the bottom and

outside the building, I knew that I had two choices to get away. Either the ferry to New Jersey or the Staten Island ferry. I chose the Staten Island ferry. As we were pulling away everything went black and the air filled with dust. I hitchhiked home. From there, I knew I had to go to the hospital so I went to one as far away from Ground Zero as I could get that was still near enough to treat my injuries, because I was worried about my one year old son breathing in potentially toxic dust and chemicals.

8. The emotional effects of 9/11 are still with me to this day. I have suffered from bouts of depression due to the events of that terrible day.
9. I sought and continue to seek medical attention for my injuries. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records along with two evaluation reports from independent medical experts related to the treatment that I received following the September 11, 2001 terrorist attacks.
10. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.
11. I previously pursued a claim through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 31 day of December 2019



A handwritten signature in blue ink, appearing to read "Daniel Kruen", is written over a solid horizontal line. The signature is fluid and cursive, with some variations in letter height and stroke thickness.

Signature of Declarant

Exhibits Filed Under Seal